

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

CHILD TRENDS, INCORPORATED et al.,

*Plaintiffs,*

v.

UNITED STATES DEPARTMENT OF  
EDUCATION et al.,

*Defendants.*

Case No. 8:25-cv-01154-BAH

**DECLARATION OF LYNN D. EISENBERG**

I, Lynn D. Eisenberg, declare as follows:

1. I am Of Counsel at the Jacobson Lawyers Group, PLLC, and am counsel for Plaintiffs in the above-captioned case. I submit this declaration in support of Plaintiffs' Motion for Preliminary Injunction or, In the Alternative, Writ of Mandamus.
2. Exhibit 1 is a true and correct Declaration of Natalia Pane, President and CEO of Child Trends, Incorporated.
3. Exhibit 2 is a true and correct Declaration of M. Christine Dwyer, Senior Vice President at RMC Research Corporation (RMC).
4. Exhibit 3 is a true and correct copy of the Comprehensive Centers program grant for the Pacific East Region, awarded to Plaintiff Child Trends on September 26, 2024.
5. Exhibit 4 is a true and correct copy of the Comprehensive Centers program grant for the Gulf Region, awarded to Plaintiff RMC Research Incorporated ("RMC") on September 26, 2024.

6. Exhibit 5 is a true and correct copy of a post on X from Elon Musk, replying “!!” to Christopher F. Rufo and dated February 18, 2025.

7. Exhibit 6 is a true and correct copy of the notice from the U.S. Department of Education, dated February 19, 2025, terminating Child Trend’s Comprehensive Centers program grant for the Pacific East Region.

8. Exhibit 7 is a true and correct copy of the notice from the U.S. Department of Education, dated February 19, 2025, terminating RMC’s Comprehensive Centers program grant for the Gulf Region.

9. Exhibit 8 is a true and correct copy of the DOGE.gov “Wall of Receipts” listing Comprehensive Center grants as among the “Savings” that DOGE has produced, last accessed on April 1, 2025.

10. Exhibit 9 is a true and correct copy of the DOGE.gov “Wall of Receipts” listing REL contracts as among the “Savings” that DOGE has produced, last accessed on April 14, 2025.

11. Exhibit 10 is a true and correct Declaration of John Doe, an employee of the U.S. Department of Education currently on administrative leave.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 15, 2025 in Washington, DC.

/s/ Lynn D. Eisenberg

Lynn D. Eisenberg\*

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